

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

12-78-15

FEDERAL DEPOSIT INSURANCE CORPORATION
AS RECEIVER FOR GUARANTY BANK

Index No. 15-cv-6560

-against-

THE BANK OF NEW YORK MELLON,

FEDERAL DEPOSIT INSURANCE CORPORATION
AS RECEIVER FOR GUARANTY BANK

Index No. 15-cv-6570

-against-

U.S. BANK NATIONAL ASSOCIATION,

FEDERAL DEPOSIT INSURANCE CORPORATION
AS RECEIVER FOR GUARANTY BANK

Index No. 15-cv-6574

-against-

CITIBANK, N.A.,

**JOINT STIPULATION AND
~~RECEIVED~~ ORDER FOR LIMITED DISCOVERY**

WHEREAS, on December 3, 2015, this Court requested the parties hereto to meet and confer, and submit to this Court an agreement concerning the scope of discovery during the pendency of any motions to dismiss.

WHEREAS, each of the parties, by and between their respective undersigned counsel, has stipulated and agreed to the terms set forth herein:

IT IS HEREBY STIPULATED AND AGREED that:

1. Each defendant must submit any motion to dismiss by **January 22, 2016**.
2. Plaintiff must submit its opposition to any motion to dismiss by **March 8, 2016**.
3. Each defendant may submit a reply to Plaintiff's opposition, no later than **March 22, 2016**.
4. Except as provided below, all discovery is stayed pending this Court's orders on any motions to dismiss, filed according to the schedule set forth herein.
5. The parties in each action shall during the pendency of the motions to dismiss:
 - a. Submit Rule 26(a)(1) Initial Disclosures by **April 5, 2016**;
 - b. Serve document requests and objections;
 - c. Meet and confer with respect to the document requests, including document custodians, search terms for electronic discovery, and sources of information to be searched; and
 - d. Meet and confer and submit: (i) electronically stored information ("ESI") protocols, and (ii) a protective order governing the confidentiality of discovery material, for the respective actions.

DATED: December 17, 2015

WOLLMUTH MAHER & DEUTSCH LLP

By: Ryan A. Kane

Ryan A. Kane
WOLLMUTH MAHER & DEUTSCH LLP
500 Fifth Avenue
New York, New York 10110

Telephone No.: (212) 382-3300

Facsimile No.: (212) 382-0050

Attorney for Plaintiff

MAYER BROWN LLP

By: 

Matthew D. Hager

Christopher J. Houpt

MAYER BROWN LLP

1221 Avenue of the Americas

New York, New York 10020

Telephone No.: (212) 506-2500

Facsimile No.: (212) 262-1910

Attorneys for The Bank of New York Mellon

Attorneys for Citibank, N.A.

MORGAN, LEWIS & BOCKIUS LLP

By: 
for

Michael S. Kraut

MORGAN, LEWIS & BOCKIUS LLP

101 Park Avenue

New York, NY 10178-0060

Telephone No.: (212) 309-6000

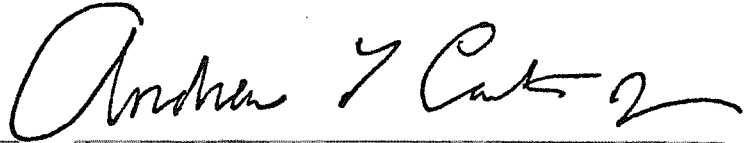
Facsimile No.: (212) 309-6001

Attorneys for U.S. Bank, National Association

ORDER

IT IS SO ORDERED.

DATED: 12-28-15

A handwritten signature in black ink, appearing to read "Andrew J. Carter", written over a horizontal line.

THE HONORABLE ANDREW J. CARTER
UNITED STATES DISTRICT JUDGE

enc